

UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT

Form 14. Motion for Extension of Time

Instructions for this form: <http://www.ca9.uscourts.gov/forms/form14instructions.pdf>

9th Cir. Case Number(s) 24-6668

Case Name Wright, et al. v. Talamantes, et al.

Requesting Party Name(s) Brian Wright

I am: ☒ The party requesting the extension.  
☐ Counsel for the party or parties requesting the extension.

I request an extension of time to file a:

- ☒ Brief (you **must** also complete the Declaration on page 3)  
☐ Motion to proceed in forma pauperis  
☐ Motion for a certificate of appealability  
☐ Response/opposition to a pending motion  
☐ Reply to a response/opposition to a pending motion  
☐ Certified Administrative Record  
☐ Response to court order dated   
☐ Other (you **must** describe the document)

The requested new due date is: March 20, 2025

I request the extension of time because (**cannot be left blank**):

(attach additional pages if necessary)

This writer is a sole practitioner with a significant civil rights caseload. He is lead counsel in Moore v. Garnand, Civil Action No. 4:19-cv-00290-RM (MAA), and co-counsel in a related state court criminal proceeding, State v. Moore, CR 2022-1627-001, in which Greg Moore, plaintiff in the civil rights case is defendant accused of multiple felonies. Lead trial counsel in the criminal case has been lost abruptly because of health reasons, and the criminal case has approaching deadlines.

Signature s/Michael Garth Moore

Date Jan 21, 2025

(use "s/[typed name]" to sign electronically-filed documents)

Feedback or questions about this form? Email us at [forms@ca9.uscourts.gov](mailto:forms@ca9.uscourts.gov)

**Recitals in criminal and immigration cases pursuant to Circuit Rule 27-8**

*Complete this section for criminal or immigration cases.*

Previous requests for extension of time to file the document, including any request for a Streamlined Extension of Time under Circuit Rule 31-2.2(a) (*select one*):

- ☐ I have **NOT** filed a previous request to extend time to file the document.
- ☐ I have previously requested an extension of time to file the document.

This motion is my  request.

*(Examples: first, second)*

Bail/detention status (*select one*):

- ☐ The defendant is incarcerated. The projected release date is: .
- ☐ The petitioner is detained.
- ☐ The defendant/petitioner in this criminal/immigration case is at liberty.

**Signature**

**Date**

*(use "s/[typed name]" to sign electronically-filed documents)*

**Declaration in support of extension to file brief under Circuit Rule 31-2.2(b)**  
*Complete this section if you are requesting an extension of time to file a brief.*

1. I request an extension of time to file the  brief.  
*(Examples: opening, answering, reply, first cross-appeal)*
2. The brief's current due date is:
3. The brief's first due date was:
4. A more detailed explanation of why the extension of time to file the brief is necessary: *(Under Circuit Rule 31-2.2(b), a request for extension of time to file a brief must be "supported by a showing of diligence and substantial need" and a conclusory statement as to the press of business does not constitute such a showing. Attach additional pages if necessary.)*
5. The position of the other party/parties regarding this request is:  
☒ Unopposed.  
☐ Opposed by *(name of party/parties opposing this motion):*  
  
☐ Unknown. I am unable to verify the position of the other party/parties because:
6. ☒ The court reporter is not in default with regard to any designated transcripts.  
 If the court reporter is in default, please explain:
7. ☒ I have exercised diligence and I will file the brief within the time requested.

I declare under penalty of perjury that the foregoing is true and correct.

**Signature**

**Date**

*(use "s/[typed name]" to sign electronically-filed documents)*

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**DECLARATION OF MICHAEL GARTH MOORE IN SUPPORT OF  
APPELLANT'S MOTION FOR EXTENSION TO FILE OPENING BRIEF  
(SECOND)**

**Case Number: 24-6668**

**Wright, et al. v. Talamantes, et al.**

Given the abrupt loss of lead trial counsel in the related criminal case, State v. Moore, and the approaching deadlines, this writer's time, outside other demands of ongoing civil rights cases, will be consumed with securing successor trial counsel and preparation of pleadings and submissions in order to meet the anticipated deadlines. In that there are more than 40,000 pages of materials disclosed by the state in the criminal case, and Mr. Moore faces what would in effect be a life sentence, this work will make it impossible for this writer to brief the issues in this appeal, which are complex and many of first impression, in a manner that represents even adequate lawyering.